

May 19, 2003

Green Mountain National Forest
ATTN: Dan McKinley, Acting District Ranger
2538 Depot Street
Manchester Center, VT 05255

Re: Greendale Project Draft Environmental Impact Statement

Dear Mr. McKinley:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) for proposed Forest Service management activities in the Greendale project area of the Manchester Ranger District on the Green Mountain National Forest (GMNF) near the Town of Weston, Vermont.

The DEIS explains that the proposed management activities would include the harvest of 3.75 million board feet of timber, improvements to stream and forest habitat, and work to reduce fire hazards in the Greendale area. According to the DEIS the timber harvests are described in concert with improvement actions that are intended to improve forest and wildlife habitat, encourage species regeneration (species type varies by location), improve understory growth and restore historic aspen stands, apple orchards and openings. The DEIS also describes in-stream structural work to improve aquatic and fish habitat in Jenny Coolidge Brook.

Based on our review of the DEIS we have several questions and concerns about the project as described with respect to riparian zone management, herbicide use, wetland resource impacts, mitigation, and the analysis of project benefits and costs. We rate this EIS "EC-2--Environmental Concerns--Insufficient Information" in accordance with EPA's national rating system, a description of which is attached to this letter. We believe all of the questions presented in the attachment to this letter can be addressed promptly or can be easily addressed and we look forward to reviewing the FEIS for the project when it is issued.

We appreciate the opportunity to comment on this DEIS. Please feel free to contact me or Timothy Timmermann at 617/918-1025 if you wish to discuss these comments further.

Sincerely,

Robert W. Varney
Regional Administrator

Additional Detailed Comments on the Greendale Project DEIS

Riparian zone management

The discussion explaining harvest procedures in the riparian zone gives the impression that the proposed activity would not be in compliance with the guidelines set forth in “Acceptable Management Practices (AMP) for Maintaining Water Quality on Logging Jobs in Vermont,” published by the Vermont Department of Forest, Parks, and Recreation. For example, information presented in Section 4.6.4.1 of the DEIS and Appendix B.1.3 states that trees that currently provide stream bank stability would be left standing, as well as at least 10 large diameter trees per 1000 feet of stream. However, it remains unclear how many trees within the riparian zone would be removed and whether the Forest Service will apply the AMP to riparian areas to protect water quality. A more detailed discussion on this topic in the FEIS is warranted.

Herbicide use

The DEIS should explain whether herbicides will be used in clearcut areas to prevent the growth of undesirable vegetation prior to replanting. If herbicides are to be used, a discussion of what herbicide will be used and the objectives (target species) of the application, concentrations of the herbicide and the likely impacts from that application should be provided.

Wetland Resource Impacts

The discussion of wetland resources at Section 2.2.3 of the DEIS states that both small and large wetland complexes exist within the project area and that the proposed action will not compromise their ecological characteristics or the contribution that surrounding forest stands make toward their value. This statement is apparently contradicted by the discussion in Section 4.3.3 of the DEIS, Environmental Effects, which notes that the proposed action and its action alternatives may impact individuals of or habitat for these species: eastern small-footed bat, Jefferson salamanders, wood turtle, several odonates, Tuckerman's pondweed, floating bur-reed, round-leaved orchis and several other plant species associated with rich woods, wetlands and ponds. This discrepancy should be clarified in the FEIS.

Appendix C - Section C-3, Analysis of Effects, provides a good discussion of effects to specific Threatened, Endangered and sensitive plant and animal species in the project area and describes the habitat needed for their continued viability. The analysis should be expanded to include a more comprehensive description of the wetland types and functions in the project area and include illustrations of wetland areas relative to the alternatives identified. Lacking this type of discussion it is difficult to fully understand the direct, indirect and potential cumulative impacts to these resources in the project area. The analysis could be strengthened through the addition of maps depicting environmental resources and unique heritage sites, including wetlands and streams, soils, and potential threatened, endangered and sensitive species within the project area.

Mitigation Measures

There is no description of how the mitigation proposed (Appendix B) will consider the ecological characteristics or the contribution of surrounding forest stands toward the wetland values described in the DEIS in Section 2.2.3.

Economic analysis

The economic analysis in Section 4.9.4.3.2 of the DEIS should be expanded to better describe the cost of recreational and other use values foregone temporarily or permanently as a result of harvesting activities. Adding a discussion of the social benefits and costs of the various harvesting alternatives would help to balance the current discussion presently dominated by projections of the project's forecasted revenues and costs. An example of areas that could be expanded in the discussion is the potential for the temporary loss of angling opportunities.